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September 4, 2008

Honorable Cathy Seibel, U.S.D.J.
United States District Court for
the Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: GEIS Properties v. Shell Oil Company
Civil Action No.: 08-Civ-3911

Honorable Judge Seibel:

On behalf of defendant Shell Oil Company, please accept this letter regarding the current discovery schedule that was set forth in Judge Brieant's order. The parties' initial exchange of responses to written discovery was unexpectedly delayed for two weeks due to a third party's demand for a confidentiality agreement and that same party's lack of cooperation in securing said agreement. The parties were able to resolve that issue and recently exchanged responses to written discovery.

Based upon the documents exchanged, the matter appears to be significantly more complicated than originally envisioned and may well require the addition of other parties through a third-party complaint. However, Shell Oil Company requires additional time to fully analyze all of the information before making that determination.

Consequently, the parties agree that depositions and/or mediation would be premature if undertaken before these other likely necessary third parties are added. Therefore, the parties request that the Court extend the deadlines set forth in the scheduling order by forty-five days to allow Shell Oil Company to complete its evaluation.

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The parties are actively working to move this matter forward and will continue to do so if afforded the requested extension.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be 'S. Woolson', written in a cursive style.

Sheila A. Woolson

SAW:dwt

cc: Honorable George A. Yanthis, U.S.M.J. (via ECF)
Nolan E. Shanahan, Esq. (via ECF and email)